

JWV/GAM: Jan. 2015

Grand Jury # 29

**IN THE UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF ALABAMA
NORTHEASTERN DIVISION**

UNITED STATES OF AMERICA

v.

LEWIS BERNARD HALL

INDICTMENT

The Grand Jury Charges:

Count One
Conspiracy
Title 18, United States Code, Section 371

At all times material to this Indictment:

1. The City of Huntsville, Alabama, was a local government that received benefits in excess of \$10,000 under a Federal program involving a grant, contract, subsidy, loan, guarantee or other form of federal assistance during 2014. The Huntsville Police Department was an entity of the City of Huntsville, Alabama, that was funded by the City of Huntsville through, among other means, federal grant funds in excess of \$10,000 received by the City of Huntsville expressly for the benefit of the Huntsville Police Department.

2. Defendant **LEWIS BERNARD HALL** was employed by the City of Huntsville, Alabama, as an officer of the Huntsville Police Department.

3. Cooperating Officer was an agent of the City of Huntsville, Alabama, and the Huntsville Police Department because he was employed by the City of Huntsville, Alabama, as an officer of the Huntsville Police Department.

4. On or about July 29, 2014, Cooperating Officer conducted a traffic stop of Individual A and, after finding approximately 3 ounces of cocaine during a search of the passenger compartment of Individual A's vehicle, took Individual A into custody. Based on the cocaine found by Cooperating Officer during the search, Individual A was charged with trafficking in cocaine.

THE CONSPIRACY

5. From on or about July 29, 2014, and continuing until on or about December 8, 2014, the exact dates being unknown, within Madison County in the Northern District of Alabama, and elsewhere, defendant

LEWIS BERNARD HALL

knowingly and willfully conspired, combined, and agreed with Individual B and others known and unknown to the Grand Jury to give, offer, or agree to give anything of value to Cooperating Officer with intent to influence or reward him in connection with any business, transaction, or series of transactions of the City of

Huntsville, Alabama, and its Police Department involving anything of value of \$5,000 or more, in violation of Title 18, United States Code, Section 666(a)(2).

MANNER AND MEANS OF THE CONSPIRACY

6. It was a part of the conspiracy that defendant **LEWIS BERNARD HALL** and Individual B would and did agree to offer money to Cooperating Officer to obtain his assistance in making the criminal case based on the seizure of cocaine from Individual A's vehicle go away.

7. It was a further part of the conspiracy that defendant **LEWIS BERNARD HALL** would and did offer Cooperating Officer \$5,000.00 if Cooperating Officer would inform other law enforcement officers that his search of Individual A's vehicle was unlawful so that the criminal case against Individual A would not be prosecuted.

OVERT ACTS

In furtherance of the conspiracy and to achieve the objects thereof, the conspirators committed and caused to be committed the following overt acts, among others, in the Northern District of Alabama and elsewhere:

8. On or about July 31, 2014, Individual B communicated with defendant **LEWIS BERNARD HALL** about offering money to Cooperating Officer to obtain his assistance in making the criminal case based on the seizure of cocaine from

Individual A's vehicle go away.

9. On or about July 31, 2014, defendant **LEWIS BERNARD HALL** offered Cooperating Officer \$5,000.00 if he would report that his search of Individual A's vehicle was unlawful so that the criminal case against Individual A would not be prosecuted.

10. On or about August 12, 2014, defendant **LEWIS BERNARD HALL** delivered \$1,000.00 cash to Cooperating Officer.

11. On or about November 24, 2014, defendant **LEWIS BERNARD HALL** confronted Cooperating Officer and told Cooperating Officer that he must stick to the story regarding the search of Individual A's vehicle.

12. On or about November 25, 2014, defendant **LEWIS BERNARD HALL** met with Cooperating Officer and reviewed what they would say when asked about the search of Individual A's vehicle.

All in violation of Title 18, United States Code, Section 371.

Count Two
Bribery
Title 18, United States Code, Sections 666(a)(2) and 2

13. The factual allegations of paragraphs 1 through 12 of this Indictment are realleged as though fully set forth herein.

14. On or about July 31, 2014, within Madison County in the Northern

District of Alabama, and elsewhere, defendant

LEWIS BERNARD HALL

did corruptly offer and agree to give anything of value to any person, with intent to influence and reward an agent of the City of Huntsville, Alabama, and its Police Department, which received federal benefits in excess of \$10,000 in a one-year period, in connection with any business, transaction, and series of transactions of the City of Huntsville, Alabama, and its Police Department involving anything of value of \$5,000 and more, that is, defendant **LEWIS BERNARD HALL** corruptly offered and agreed to give \$5,000.00 to Cooperating Officer as a bribe intending to influence and reward him in connection with the criminal case against Individual A.

All in violation of Title 18, United States Code, Sections 666(a)(2) and 2.

Count Three
Obstruction of Justice
Title 18, United States Code, Section 1512(b)(3) and 2

15. The factual allegations of paragraphs 1 through 12 of this Indictment are realleged as though fully set forth herein.

16. From on or about July 30, 2014, and continuing to on or about December 8, 2014, within Madison County in the Northern District of Alabama,

and elsewhere, defendant

LEWIS BERNARD HALL

did knowingly attempt to corruptly persuade Cooperating Officer by bribery with the intent to hinder, delay, and prevent communication to a law enforcement officer of information relating to the commission and possible commission of a federal offense and violation of conditions of supervised release by Individual A by offering and paying Cooperating Officer cash if he would report that his search of Individual A's vehicle was unlawful.

All in violation of Title 18, United States Code, Sections 1512(b)(3) and 2.

Count Four
False Statement
Title 18, United States Code, Section 1001 and 2

17. The factual allegations of paragraphs 1 through 12 of this Indictment are realleged as though fully set forth herein.

18. On or about December 8, 2014, within Madison County in the Northern District of Alabama, and elsewhere, defendant,

LEWIS BERNARD HALL,

in a matter within the jurisdiction of the executive branch of the United States Government and the United States Department of Justice, knowingly made and caused to be made a materially false, fictitious, and fraudulent statement and

representation; that is, the defendant stated to an agent of the Federal Bureau of Investigation that he did not give money to Cooperating Officer in connection with his reporting regarding his search of Individual A's vehicle whereas, as the defendant then well knew and believed, he gave \$1,000.00 to Cooperating Officer to influence and reward him in connection with his reporting regarding his search of Individual A's vehicle.

All in violation of Title 18, United States Code, Sections 1001 and 2.

A TRUE BILL

/s/ _____
Foreperson of the Grand Jury

JOYCE WHITE VANCE
UNITED STATES ATTORNEY

/s/ _____
GEORGE A. MARTIN, JR.
Assistant United States Attorney